I disagree with the FCC proposal (05-235) to eliminate all Morse code testing for Amateur Radio licenses. While I can see a rationale for eliminating code testing from the Technician and General class license requirements---now that it is not required by international agreement for high frequency communication---it should be retained for the Extra class license.

Code of Federal Regulations (CFR) Part 97.1(c) states that one purpose of the Amateur Radio Service is "Encouragement and improvement of the amateur service through rules which provide for advancing skills in both the communication and technical phases of the art." The three levels of license privileges are part of an incentive system; if you learn more and pass an exam, you get more privileges. Morse code is one of the few elements of amateur radio that has remained constant since the days of spark-gap transmitters. Practically every other aspect of amateur radio has changed with technology advances, but Morse code is a common thread of knowledge that links the communication skills of all technically advanced amateur operators. While the emphasis on CW mode has decreased with advances in radio equipment, it is still used by many operators and in fact was used by some during the Hurricane Katrina relief efforts when they were forced to operate with low power.

Opponents of Morse code testing claim CW is an obsolete mode they will never use, so they shouldn't be required to learn it. If that logic were correct, there should be no questions on the written portion of amateur tests that relate to theory of transmitter and amplifier operation. Most amateur radio operators now purchase commercial equipment and never build or repair their own electronics. But it would be foolish not to include basic transmitter and amplifier theory on amateur radio exams since it is a backbone of the knowledge that is needed for advancing the skills of amateur operators. As an analogy, these days most people use electronic calculators or spreadsheets to do calculations. Should we stop teaching arithmetic in our schools since nearly no one does calculations by hand any more? Of course not---knowledge of arithmetic is an important basis for use of quantitative information in society. Morse code is in a similar situation. While you can communicate without knowing Morse code, it is a valuable and useful skill as envisioned in CFR Part 97.1(c) which calls for advancing skills in both the communication and technical phases of the art. Stopping all testing for Morse code will eliminate CW as a skill for amateur radio operators; there will be no incentive for new operators to learn Morse code and achieve the very modest skill level currently required [and face it, 5 words per minute is not a very stringent requirement]. Part 97.1(c) of the Federal Regulations says that a purpose of the Amateur Service is to advance skills of operators. Eliminating a skill among the population of amateur operators hardly advances the skills this part of the regulation promotes. Thus, proposals to eliminate CW testing are inconsistent with the purpose stated in Part 97.1(c) of the Federal Regulations.

Code of Federal Regulations (CFR) Part 97.1(a) states that a purpose of the Amateur Radio Service is "Recognition and enhancement of the value of the amateur service to the public as a voluntary noncommercial communication service, particularly with respect to providing emergency

communications."  The contribution of Amateur Radio to emergency communications has been aptly demonstrated, especially during the recent series of hurricanes along the Gulf Coast.  While most communications for these emergencies were conducted by voice, there were instances of communication via Morse code from amateurs who had to operate under low power or with damaged radio systems.  Indeed, loss of local electric power and damaged equipment are conditions that frequently occur at the site of natural disasters.  If the Amateur Radio Service is to continue to provide the emergency communication service stated in Part 97.1(a) of the Federal Regulations we must ensure that some amateur operators are skilled in communicating in many data modes, especially those that might occur under less than optimal conditions such as low power.  CW is a mode that works well under low power and with fairly crude equipment---just the sort of circumstance that might occur in an emergency.  Do we want to train a generation of amateur radio operators for emergency communication who cannot recognize and respond to an SOS?  Not requiring some skill in CW is counter to the purpose of providing amateur service to the public in emergency communications.

Code of Federal Regulations (CFR) Part 97.1(e) states that another purpose of the Amateur Radio Service is "Continuation and expansion of the amateur's unique ability to enhance international goodwill."  Using CW, abbreviations, and Q signals, an American amateur operator can converse with foreign operators in many countries even though neither can speak the other's language.  That is because CW used in this manner is a common language to both parties.  Few American amateur operators today speak foreign languages and the trend for foreign language skills among Americans continues to decline.  Removing the Morse code testing requirement will eliminate the incentive for new American amateurs to learn CW and thereby further decrease the ability of American amateur operators to communicate with foreign amateurs.  The essence of promoting international goodwill is tied to the ability of two individuals to communicate with each other.  Removing the incentive to learn CW will decrease the ability of American Operators to communicate with foreign operators which will in turn reduce American amateur's ability to enhance international goodwill, in direct contradiction of the purpose of Part 97.1(e) of the Federal Regulations.

Most of those opposing Morse code testing claim it is an obsolete skill they will never use.  Yet it has deep historical roots in the amateur radio service and has practical utility for any amateur operator in emergencies or when conditions do not permit voice operation.  Eliminating testing of Morse code removes the incentive for people to learn the skill and guarantees that the skill will wither and die.  The Basis and Purpose of the Amateur Service defined in Part 97.1 of the Federal Regulations emphasizes providing public service especially through emergency communications, advancing the art of radio communications, advancing the communication and technical skills of operators, advancing the reservoir of skilled operators, and enhancing international goodwill through communication.  None of these purposes are enhanced by the elimination of a basic skill like Morse code.  In fact, all of the purposes are diminished by elimination of the incentive to learn this basic skill.

The FCC has done a good job of partitioning the requirements for skills and knowledge with incentives of the three-tiered incentive licensing system. While it may be fine to remove the Morse code requirement from the General class license since it is no longer required by international agreement, there is no reason to completely eliminate the skill from those in the incentive licensing system. We should retain Morse code testing for the Extra license so there will be some amateurs who develop the knowledge and skill to use that mode of communication. Elimination of Morse code testing from all licensing would be inconsistent with the FCC's stated Basis and Purpose of the Amateur Radio Service in Part 97.1 of the Federal Regulations.

Sincerely,

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